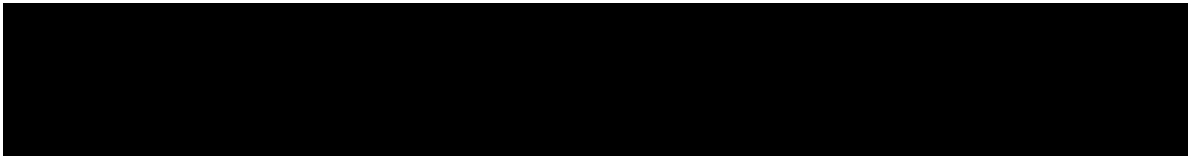


EXHIBIT D



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIKING TECHNOLOGIES, LLC,

Plaintiff,

v.

ASSURANT, INC.,

Defendant.

JURY TRIAL DEMANDED

C.A. No. 2:20-cv-00357-JRG
LEAD CASE

VIKING TECHNOLOGIES, LLC,

Plaintiff,

v.

ASURION, LLC ET AL,

Defendants.

C.A. No. 2:20-cv-00358-JRG

VIKING TECHNOLOGIES, LLC,

Plaintiff,

v.

CLOVER TECHNOLOGIES GROUP, LLC
ET AL,

Defendants.

C.A. No. 2:20-cv-00359-JRG

DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

Pursuant to P.R. 3-1 and 3-2, Plaintiff Viking Technologies, LLC (“Viking”) hereby makes the following *Disclosure of Asserted Claims and Infringement Contentions* with respect to U.S. Patent No. 8,888,953 (“the ’953 Patent”) and U.S. Patent No. 10,220,537 (“the ’537 Patent”) (collectively, the “Patents-in-Suit”).

I. DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

A. ASSERTED CLAIMS

Assurant, Inc., Asurion, LLC, uBreakiFix Co., Clover Technologies Group, LLC, Clover Wireless, LLC, Reconext LLC, Teleplan Holding USA, Inc., and Teleplan Service Solutions Inc. (collectively, “Defendants”) have infringed and continue to infringe at least the following claims of the ’953 and ’537 Patents:

Claims 1 and 4 of the ’953 Patent.

Claims 1, 4 and 8–10 of the ’537 Patent.

Without the benefit of discovery, Viking identifies these claims based on limited information regarding Defendants’ and their vendors’ confidential processes for the removal of the protective glass covers as part of the remanufacturing of touchscreen displays in smartphones and/or tablets. Viking therefore reserves the right to seek leave of the Court to add, delete, substitute, or otherwise amend this list of asserted claims should further discovery, the Court’s claim construction, or other circumstances so merit.

B. ACCUSED PROCESSES AND PRODUCTS BY PROCESSES AND CLAIM CHARTS

Defendants directly infringe the asserted claims of the Patents-in-Suit under 35 U.S.C. § 271(a) by using the accused processes in the United States as set forth in the attached claim charts in the remanufacture of touchscreen displays for smartphones and/or tablets. Defendants directly infringe the asserted claims of the Patents-in-Suit under 35 U.S.C. § 271(g) importing, selling, offering to sell, or using in the United States smartphone and/or tablet display assemblies remanufactured, at least in part, using the accused processes to remove protective glass covers from the display assemblies as set forth in the attached claim charts.

Defendants’ (and their vendors’) processes for the remanufacture of smartphone and/or tablet displays are not public and therefore evidence of the specific machines and techniques cannot presently be identified. Defendants’ (and their vendors’) processes have been and continue

to be used to remanufacture the touchscreen displays of at least smartphones and/or tablets sold by, for example, Samsung Electronics, Apple, and Google, including at least the following exemplary models:

Samsung Smartphones and Tablets
Galaxy Ace Plus, Galaxy Y Pro DUOS, Galaxy Beam, Galaxy Y DUOS, Galaxy Mini 2, Galaxy Ace 2, Galaxy Ace 2x, Galaxy Pocket, Galaxy Rugby Smart, Galaxy S Advance, Galaxy S II Lite, Galaxy Rugby, Galaxy Chat, Samsung Galaxy Appeal, Galaxy S III, Galaxy Stellar, Galaxy S Duos, Galaxy Trend, Galaxy Trend II Duos, Galaxy Rush, Galaxy S Relay 4G, Galaxy Note II, Galaxy Verbb, Galaxy Victory 4G LTE, Galaxy Pocket Duos, Galaxy Rugby Pro, Galaxy Rugby LTE, Galaxy Express, SGH-I437, Galaxy Discover, Galaxy Centura, Galaxy S III Mini, Galaxy Grand, Galaxy S II Plus, Galaxy Pocket Plus, Galaxy Xcover 2, Galaxy Young, Galaxy Mega, Galaxy Fame, Galaxy S4, Galaxy Star, Galaxy Core, Galaxy Y Plus, Galaxy Win, Galaxy Grand Quattro, Galaxy S4 Active, Galaxy S4 Zoom, Galaxy Ace 3, Galaxy Pocket Neo, Galaxy S4 Mini, Galaxy Note 3, Galaxy Gear, Galaxy Star Pro, Galaxy J, Galaxy Express 2, Galaxy Round, Galaxy Trend Lite, Galaxy Fame Lite, Galaxy Light, Galaxy Core Plus, Galaxy Grand 2, Galaxy Win Pro, Galaxy J, Galaxy S Duos 2, Galaxy Trend Plus, Galaxy Note 3 Neo, Samsung Galaxy Grand Neo, Galaxy Grand Lite, Galaxy Win 2, Galaxy S5, Galaxy S3 Neo, Galaxy K Zoom, Galaxy Ace Style, Galaxy Core, Galaxy Core 2, Galaxy S5 Mini, Galaxy Star 2 Plus, Galaxy Ace 4, Galaxy S Duos 3, Galaxy Alpha, Galaxy Grand Prime, Galaxy Core Prime, Galaxy Pocket 2, Galaxy Mega 2, Galaxy Note 4, Galaxy Young 2, Galaxy Core Prime, Galaxy Note Edge, Galaxy A5, Galaxy A3, Z1, Galaxy J1, Galaxy E5, Galaxy A7, Galaxy E7, Galaxy Xcover 3, Galaxy S6 Edge, Galaxy S6, Galaxy Gear 2, Galaxy S6 Active, Galaxy J5, Galaxy J7, Galaxy Trend 2 Lite, Galaxy V Plus, Galaxy S6 Edge+, Galaxy A8, Galaxy Note 5, Galaxy S5 Neo, Galaxy J2, Galaxy J1 Ace, Galaxy Active Neo, Galaxy On2, Z3, Galaxy View, Galaxy On3, Galaxy A7 (2016), Galaxy A5 (2016), Galaxy A3 (2016), Galaxy J1 (2016), Galaxy TabPro S, Galaxy A9 (2016), Galaxy J1 Mini, Galaxy S7 Edge, Galaxy S7, Galaxy J3 (2016), Galaxy Tab A 7.0, Galaxy A9 Pro (2016), Galaxy J5 (2016), Galaxy J7 (2016), Galaxy Tab A 10.1 (2016), Galaxy C5, Galaxy C7, Galaxy S7 Active, Galaxy J3 Pro, Galaxy J2 Prime, Galaxy Note 7, Galaxy A8 (2016), Galaxy On5 (2016), Galaxy On7 (2016), Galaxy J7 Prime, Galaxy C9 Pro, Galaxy A7 (2017), Galaxy A5 (2017), Galaxy A3 (2017), Galaxy C5 Pro, Galaxy Tab, Galaxy C5 Pro, Galaxy S8, Galaxy S8+, Galaxy Xcover 4, Galaxy J3 (2017), Galaxy J5 (2017), Galaxy J7 (2017), Galaxy J7 Max, Galaxy Note Fan Edition, Galaxy S8 Active, Galaxy Note 8, Galaxy J7+, Galaxy Tab A 8.0 (2017), Galaxy C8, Galaxy C7, Galaxy Tab Active, Galaxy A5 (2018), Galaxy A5+ (2018), Galaxy J4 Pro, Galaxy S9, Galaxy S9+, Galaxy J4 Prime 2, Galaxy J7 (2018), Galaxy J3 Duo, Galaxy A6 (2018), Galaxy A6+ (2018), Galaxy J4 (2018), Galaxy J6 (2018), Galaxy A8 Star, Galaxy J7 (2018), Galaxy J8 (2018), Galaxy On6, Galaxy Note 9, Galaxy Tab A 10.5 (2018), Galaxy Tab S4, Galaxy A7 (2018), Galaxy J4+, Galaxy J6+, Galaxy A9 (2018), Galaxy A6s, Galaxy A8s, Galaxy M10, Galaxy M20, Galaxy Tab S5e, Galaxy Tab A 10.1 (2019), Galaxy M30, Galaxy S10+, Galaxy S10, Galaxy S10e, Galaxy A50, Galaxy A30, Galaxy A10, Galaxy S10 5G, Galaxy View 2, Galaxy A60, Galaxy A70, Galaxy A80, Galaxy A40, Galaxy A20, Galaxy A20e, Galaxy A2 Core, Galaxy M40, Galaxy A10s, Galaxy A10e, Galaxy Note 10, Galaxy Note 10+, Galaxy M10s, Galaxy A70s, Galaxy A50s, Galaxy A30s, Galaxy A90 5G, Galaxy Z Fold, Galaxy M30s, Galaxy A20s, Galaxy A01, Galaxy A71, Galaxy A51, Galaxy Tab S6 5G, Galaxy Xcover Pro, Galaxy Note 10 Lite, Galaxy S10 Lite, Galaxy M31, Galaxy Z Flip, Galaxy S20, Galaxy S20+, Galaxy S20 Ultra, Galaxy M11, Galaxy A31, Galaxy A41, Galaxy M21, Galaxy A11, Galaxy J2 Core (2020), Galaxy A Quantum, Galaxy A71 5G, Galaxy A51 5G, Galaxy A21, Galaxy Tab S6 Lite, Galaxy A21s, Galaxy M01, Galaxy A01 Core, Galaxy M01s, Galaxy A71 5G UW, Galaxy Note 20, Galaxy Note 20 Ultra, Galaxy Z Flip 5G, Galaxy Tab S7, Galaxy Tab S7+, Galaxy A51

5G UW, Galaxy M31s, Galaxy Z Fold2 5G, Galaxy M51, Galaxy F41, Galaxy S20 FE, Galaxy A02s, Galaxy A12, Galaxy M21s, Galaxy A42 5G
Apple Smartphones and Tablets
iPhone 5, iPhone 5C, iPhone 5S, iPhone 6, iPhone 6 Plus, iPhone 6S, iPhone 6S Plus, iPhone SE, iPhone 7, iPhone 7 Plus, iPhone 8, iPhone 8 Plus, iPhone X, iPhone XS, iPhone XS Max, iPhone XR, iPhone 11, iPhone 11 Pro, iPhone 11 Pro Max, iPhone SE (2nd), iPhone 12, iPhone 12 Mini, iPhone 12 Pro, iPhone 12 Pro Max, iPad Mini, iPad (4th generation), iPad Air, iPad Mini 2, iPad Mini 3, iPad Air 2, iPad Mini 4, iPad Pro (1st generation, 9.7"/12.9"), iPad Pro (1st generation, 9.7"), iPad (5th generation), iPad Pro (2nd generation, 10.5"/12.9"), iPad (6th generation), iPad Pro (3rd generation, 11"/12.9"), iPad Air (3rd generation), iPad Mini (5th generation), iPad (7th generation), iPad Pro (4th generation, 11"/12.9"), iPad (8th generation), iPad Air (4th generation)
Google Smartphones
Nexus 4, Nexus 5, Nexus 6, Nexus 5X, Nexus 6P, Pixel, Pixel 2, Pixel 3, Pixel 3a, Pixel 4, Pixel 4a, Pixel 5

Claim charts identifying a location of every element of every asserted claim of the Patents-in-Suit in the remanufacture of touchscreen displays for smartphones and/or tablets, including whether each element of each asserted claim is claimed to be literally present or present under the doctrine of equivalents, are attached hereto as Exhibits A ('953 Patent) and B ('537 Patent). Viking further reserves the right to amend these claim charts, as well as other information contained in this document, for example, upon the Court's issuance of a claim construction order.

C. PRIORITY DATES

Pursuant to P.R. 3-1(e), Viking states that each of the asserted claims of the '953 Patent is entitled to the filing date of U.S. Provisional Patent Application No. 61/715,015, filed October 17, 2012. A copy of this provisional application is being produced herewith and bears production numbers VIKING_0003273 – 3320.

Pursuant to P.R. 3-1(e), Viking states that each of the asserted claims of the '537 Patent is entitled to the filing date of U.S. Provisional Patent Application No. 61/715,015, filed October 17, 2012. A copy of this provisional application is being produced herewith and bears production numbers VIKING_0003273 – 3320.

D. VIKING'S USE OF THE PATENTED METHOD

Viking intends to rely on its own processes used in the remanufacture of touchscreen displays for smartphones. Viking practiced the methods of each of the asserted claims of the Patents-in-Suit to remove broken glass from smartphone display assemblies as part of the

remanufacture process. For example, the video produced at VIKING_0002097 shows an employee of Viking employing at least the methods of the asserted claims of the '537 patent to remove the protective glass cover of a smartphone.

II. PRODUCTION OF DOCUMENTS

Viking is producing documents corresponding to each of the following categories.

Pursuant to P.R. 3-2(a), documents and information related to the conception and reduction to practice of the Patents-in-Suit are being produced herewith. Beginning and ending production numbers for each of these documents can be found in Exhibit C, attached hereto.

Pursuant to P.R. 3-2(b), documents and information relating to the disclosure of the patented technology and the provision of products made using the patented technology to third parties are being produced herewith. Beginning and ending production numbers for each of these documents can be found in Exhibit D, attached hereto.

Pursuant to P.R. 3-2(c), copies of the file histories of the Patents-in-Suit are being produced herewith and bear production numbers VIKING_0002099–2433 and VIKING_0002751–3272.

This preliminary identification of documents is for convenience and is not an admission that each document falls within the identified categories, or that any document qualifies as prior art. Viking is continuing with its investigation. COVID-19 travel restrictions have prevented a complete collection of documents from Stuart Teo Teck, the named inventor of the Patents-in-Suit. As travel restrictions are lifted, Viking will retrieve additional documents and produce them. Viking reserves its right to add to, delete from, or otherwise modify its disclosures in this section as its investigation proceeds.

Dated: January 6, 2021

/s/ Mark S. Raskin

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CERTIFICATE OF SERVICE

I hereby certify that the counsel of record who are deemed to have consented to electronic service are being served today with a copy of this document via email.

/s/ Mark S. Raskin

Mark S. Raskin

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